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SOUTHERN DISTRICT OF NE	W YORK	No.
REGINA CONCEICAO,		X
	Plaintiff,	Docket #:
-against-		COMPLAINT
		Plaintiff Demands Trial By Jury
SHARAFA ADEBOYE and MA	RCIA REYES,	
	Defendants.	
		X

Plaintiff, **REGINA CONCEICAO**, by her attorneys **ROBINSON & YABLON**, **P.C.**, complaining of the defendants sets forth:

BASIS OF JURISDICTION & VENUE

1. The jurisdiction of this Court is predicated upon diversity of citizenship pursuant to 28 U.S.C. §1391 (a)(2) and 28 U.S.C. §1391 (b)(2) as the dispute involves parties from different States, damages are in excess of this Court's jurisdictional limits and a substantial part of the events or omissions giving rise to the claim occurred in the Southern District of New York.

IDENTITY OF PARTIES

- 2. The plaintiff, Regina Conceicao, is a resident of the State of New York.
- 3. The defendant, Sharafa Adeboye, is a resident of the State of New Jersey.
- 4. The defendant, Marcia Reyes, is a resident of the State of New Jersey.

- 5. That on July 8, 2018, plaintiff, Regina Conceicao, was a passenger on a 2013 motorcycle bearing New Jersey license plate 2HKH4.
- 6. That on July 8, 2018, defendant, Sharafa Adeboye, was the operator of a 2013 motorcycle bearing New Jersey license plate 2HKH4.
- 7. That on July 8, 2018, defendant, Marcia Reyes, was the owner of a 2013 motorcycle bearing New Jersey license plate 2HKH4, being operated with permission by defendant, Sharafa Adeboye.
- 8. That on July 8, 2018, the roadway known as Seven Lakes Drive approximately 150 feet east of Bear Mountain Circle, in Rockland County, New York, was and still is a public roadway and thoroughfare.
- 9. That on July 8, 2018, on the roadway known as Seven Lakes Drive approximately 150 feet east of Bear Mountain Circle, in Rockland County, New York, defendant, Sharafa Adeboye, negligently and carelessly operated the motorcycle owned by defendant, Marcia Reyes, while plaintiff, Regina Conceicao, was a passenger on said motorcycle, causing it to leave the roadway and collide with a guide rail, thereby throwing plaintiff, Regina Conceicao off the motorcycle. A copy of the Police Accident Report detailing the incident is attached hereto.
- 10. That the aforementioned occurrence and resulting injuries to plaintiff, Regina Conceicao, were caused solely by the recklessness, carelessness and negligence of the defendants, Sharafa Adeboye and Marcia Reyes, in the ownership, operation, maintenance and control of their motorcycle.

Case 7:19-cv-00597-VB Document 5 Filed 01/22/19 Page 3 of 6

11. That as a result of the aforementioned occurrence, plaintiff, Regina Conceicao,

sustained serious, and disabling injuries; that she has suffered, still suffers and in the future will

continue to experience severe pain and suffering; that she was confined to her bed and home and

was prevented from pursuing her usual and customary activities of daily living; that she has been

required to seek continuous medical care and treatment which she will need into the future; that

she has incurred hospital expenses and medical expenses, which she will continue to sustain.

12. As a result of the negligence of defendants, plaintiff, Regina Conceicao suffered a

"serious injury" as set forth in §5102(d) of the New York State Insurance Law and the economic

loss to plaintiff, Regina Conceicao, is greater than basic economic loss as defined by law.

13. That by reason of the foregoing, plaintiff, Regina Conceicao, has been damaged

in the sum of Five Hundred Thousand Dollars (\$500,000.00) and demands judgment against the

defendants, Sharafa Adeboye and Marcia Reves.

WHEREFORE, plaintiff, Regina Conceicao demands judgment against the defendants,

Sharafa Adeboye and Marcia Reyes, in the sum of Five Hundred Thousand Dollars

(\$500,000.00) along with such other and further relief as may be granted by the Court, including

but not limited to the costs and disbursements of this action.

Dated: New York, New York

January 21, 2019

ROBINSON & VABLON P

Attorneys for Plainti

By: Jared R. Cooper (JRC 2975)

232 Madison Avenue, Suite 909

New York, New York 10016

(212) 725-8566

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